

July 30, 2019

Commissioner Glen Mulready, CoChair
Melinda Domzalski-Hansen, CoChair
Accident and Sickness Insurance Minimum Standards (B) Subgroup
National Association of Insurance Commissioners
444 North Capitol Street, NW, Suite 700
Washington, DC 20001

Via e-mail: jmatthews@naic.org

Dear CoChairs Mulready and Domzalski-Hansen:

The American Council of Life Insurers (ACLI), appreciates the opportunity to offer its comments on Sections 1 through 5 of the staff working draft of NAIC Model 171, Model Regulation to Implement the Supplementary and Short-Term Health Insurance Minimum Standards Model Act

ACLI represents the interests of policyholders and consumers. We are committed to providing fair benefits that provide financial security in the event of illness or injury for millions of working Americans and their families. We are committed to affordable and valuable products that enable consumers to have access to quality dental and vision care and to address the financial impact of accidents and illness beyond medical expense coverage. Additionally, we are committed to ensuring that consumers understand that these products provide important financial protection but are not an alternative to major medical coverage.

The Model Regulation should establish separate sections identifying appropriate minimum standards and disclosures required for short-term limited duration insurance.

ACLI supports the continued distinction between supplementary and short-term health insurance coverage reflected in the scope of the Supplementary and Short-Term Health Insurance Minimum Standards Model Act (Model 170). We support this continued distinction via separate sections within Model 171 for appropriate minimum standards and required disclosures applicable to short-term limited duration health insurance (which is a form of comprehensive medical coverage and is NOT a HIPAA-accepted benefit) and included supplemental benefits (and

While the minimum standards and disclosure requirements should differ between supplementary and short-term limited duration insurance sections, they do not appear to require significant changes to differentiate those products. Subsequent sections can differentiate one of the defined terms that may have different significance or be inapplicable for different covered products (i.e., 3 3 UH L V W L Q J F R V G L I W H I S Q W). We believe this could be adequately addressed under the relevant minimum standards to be considered in later sections.

We look forward to continuing to work with you. 0 4(wa)6(rd to c)5(ontd t024 614dm >3t [(that ma)-17(y)

